Decer Mr. Reilleg Please support the use of HiTEC 3000 addetice to gasolène. Os a concerned citizen it is apparent that major improvements er air quality can lac achieved with this product. Charles a. Baulo

Charles & Danielo Due

11/4/20

To william k Pailly, dease do not give the OK. to Ethyl, and companies like their to use month as a gassine additive Hesn't the harmful effects of metals in our encironment born demonstrated emough These metals do not go away, rather they accumulate beyond site (??)

Thenks, Siguranian Keurn hitsgerald

Dear Mr. Reilly,

I realize this is probably a fatile effort,

based on the EPA's reputation and record so far,

but I urge you to reject Ethyl Corporation's

application to use methycyclopentadicnyl

manganese tricarbonyl Chut). Their gift

to us of beaded gasoline also clarmed that

the health demorronmental effects would be negligible.

There are many parallels between lead and MMI.

Please REJECT -1/25 application. Just Say no — for our health, for our

environ niert.

Thanks.

Soncevely,

Naomi Durant

5342 W. 102 St.

Overland Park, K5 66207

JANET MOUNTJOY

237 Echo Lane, Portola Valley, California 94028

November 2, 1990

William K. Reilly Administrator Environmental Protection Agency Washington, D.C. 20460

Dear Mr. Reilly,

It has come to my attention that the Ethyl Corporation has requested permission to use Manganese as an octane booster to gasoline. I urge you to reject this petition because there is insufficient data on health and safety effects of massive amounts of this mineral entering our air and accumulating in our environment to be certain that its addition to gasoline will not cause a disaster similar to that caused by the use of lead as an additive to gasoline.

The claim that the use of manganese can reduce the emissions of hydrocarbons and nitrous oxides from cars is not a sufficient reason to overlook the potential of its disastrous effects on health.

Sincerely yours,

Janet R. Mountjey

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EPA

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October 23, 1990

William K. Reilly-Administrator Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Mr. Reilly:

As a concerned citizen for the saftey of our environment, I strongly urge you to deny the Ethyl Corporation's application for "HiTech 3000," a toxic manganese-based gasoline additive I believe needs further testing before it is released into the environment.

Sincerely,

. .

## LUCIUS T. HILL, M.D., F.A.C.S. GENERAL SURGERY

9 Buzell Avenue ● PO Box 433 ● Exeter, New Hampshire 03833 603 772-4791

October 29, 1990

William K. Reilly Administrator Environmental Protection Agency 401 M Street SW Washington, D.C. 20460

Dear Mr. Reilly,

The EPA has the potential to prevent Ethyl Corporation of America from adding Hi Tec 3,000 to gasoline in this country. This product contains manganese, a toxic heavy metal, and it is critical that the EPA prevent this additive from becoming widespread in this country. We strongly advise you to prevent the use of this material.

Sincerely yours,

Lucius T. Hill, Jr., M.D

LTH/shl

GOORLOOMTEDL CORRECONTROL PALLOLINEDL PALLOLINEDL ST. 15

Charles R. Holman Rt 1 Box 154H Indian Head, MD 20640 October 16, 1990

Administrator William K. Reilly Environmental Protection Agency 401 M Street, S.W. Washington, DC 20460

Dear Mr. Reilly:

I am one of many citizens who is concerned about the "greenhouse effect" caused in part by the world's automobiles — the United States among the chief offenders. I understand that the Ethyl Corporation has developed an additive that reduces pollutants and increases mileage. Tests conducted on Hitec 3000 have conclusively indicated EPA approved usage would be a positive step forward in conquering some of the environmental problems we are experiencing.

I strongly urge that your agency approve the use of Hitec 3000.

Sincerely,

Charles R. Holman

GOOCTIG P3:39
CORR. CONTROL
SCOTT

P.11

ROBERT E. BOGARD 66 MADISON AVE. #3B NEW YORK, NY 10016

ADMINISTRATOR WILLIAM K. REILLY Environmental Protection Agency 401 M. Street, SW Washington, DC 20460

Dear Mr. Reilly:

I am writing to express my concern about the proposed application for "HiTec 3000" by the Ethyl Corporation. As I am sure you are aware, this product contains manganese, a toxic heavy metal which would be released into the atmosphere should this product become approved.

The Ethyl corporation is citing certain bits of data that seem to indicate that the use of methycyclopentadienyl manganese tricarbonyl (MMT) will not increase airborne manganese concentration over cities. They are ignoring contrary evidence to this, and apparently have almost accomplished their goal of having the EPA approve their application. The fact remains that there have not been sufficient studies to support Ethyl's claims, and it would be extremely unwise to authorize the release of even more pollution into our environment, especially now in the light of the new clean air legislation in Congress. Since we are about to try to mend the ravages of our past heavy use of gasoline, it is unthinkable that we are considering encouraging even more health-hazardous materials to be introduced into this substance.

I strongly urge you to reject Ethyl's application and suspend all curently permitted use of manganese as a gasoline additive in the United States.

Sincerely,

Robert E. Bogard

F.10

CORR. CONTROL CORR. CONTROL COURS A 3: 21 TOWN OF WELLESLEY



## MASSACHUSETTS

## NATURAL RESOURCES COMMISSION TOWN HALL, WELLESLEY, MA 02181

WETLANDS PROTECTION COMMITTEE LANDSCAPE ADVISORY COMMITTEE LONG RANGE PLANNING COMMITTEE JUDITH A. NICOLSON
DIRECTOR
TELEPHONE: (617) 431-1019 x294

October 26, 1990

William K. Reilly EPA Administrator U.S. Environmental Protection Agency 401 M Street SW Washington, DC 20460

Subject: Ethyl Corp. application to use manganese compound as

additive in gasoline

Dear Mr. Reilly:

Just say NO! It would be folly beyond comprehension to subject the citizens of this country to an experiment in mass poisoning when we have the history of lead additives unmistakably before us.

There really isn't anything else to say - just DON'T!

Thank you for listening and acting.

Very truly yours,

Judith A. Nicolson

Director

cc: nrc

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AND
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1S: FA 08 13000

T. Britt Griswold 3807 Foxfield Lane Fairfax, VA 22033-1303 (703) 830-7571

William K. Reilly **Environmental Protection Agency** Washington, DC 20460

Dear Mr. Reilly,

I urge you to reject the Ethyl Corporation's application to create and market a manganese additive (MMT) for gasoline. Without the same kind of indepth studies which proved lead additives to be a tragic burden on our society, common sense says that a metallic substance that exhibits similar characteristics to lead in high doses is probably going to cause similar problems as lead in low doses.

The burden of proof should be squarely on Ethyl's shoulders to prove beyond the standard of testing established by lead that MMT is safe. I do not believe they

have done that.

Do not let the madness of a company solely interested in profit poison us and our children.

Sincerely yours,

J. Britt Greeneld T. Britt Griswold 10/22/90

SOUCTED ENTED TO BE A MEDICAL TO BE A MEDICAL

## A New Idea from the Folks Who Gave Us Leaded Gas

By EDF toxicologist Dr. Ellen K. Silbergeld. who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.

n 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won



removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.

Now, in 1990, Ethyl comes bearing

ELLEN K. SILBERGELD yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

Lead poisoning is an epidemic in the U.S. Even after considerable reductions

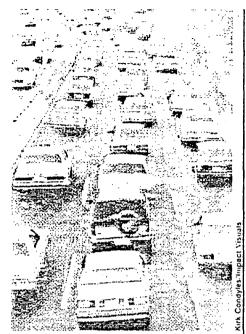
Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.

The State of the S

have been imposed on the use of lead in gasoline-only after prolonged debate and litigation, it should be noted-we are just now confronting the extraordinarily difficult challenge of cleaning up the residues of lead fallout from playgrounds, roadsides, and backyards in America.

The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The exclusive justification for each additive is its purported effect on emissions of hydrocarbons and nitrous oxides from cars. No data were or are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.

In 1925, Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in certain industrial settings. In 1990, it argues that



With ever-increasing numbers of cars on the road, manganese added to gasoline wouldlike lead-accumulate in the environment with potentially tragic results, particularly in urhan areas

the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor-more important-any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead-we have not yet conducted a massive human experi-

ment with manganese. But both what we know and what we do not know about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do not know what the long-term chronic, low-dose effects of human exposure to manganese are. We do not know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do not know if manganese is carcinogenic. although there is evidence that it can break DNA, which may indicate cancercausing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will

Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline. Distance services and an artist services.

accumulate in many places-particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

**EDF MEMBER ACTION ALERT** Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT.

PROTOCTIONS ACCORDED MIR. WILLIAM K. REILLY, ADMINISTERATORS 4PI "M" STREET, S.V. VJKSHINGTON, SC. 49460

I SER P.R. KEILY,

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THAT HE TO SAIL TO ME KNO ATTENTION.

1812 N. Commas WEAGH AV.

C. Jeffrey & Teresa W. Stump 101 Park Street Christiansburg, Virginia 24023

October 24, 1990

Administrator William K. Reilly Environmental Protection Agency 401 M Street, SW Washington, D.C. 20460

Dear Administratur Reilly:

As active environmentalists, we strongly urge you to deny Ethyl Corporation's application for "HiTec 3000". Our environment does not need another toxic gasoline additive like manganese.

Very truly yours, C Jeff Stury Lerese W. Stury

\$2000158 65 57 \$27%)/ \$27%)/ \$2000158 65 57 Law Offices

Christopher A. Kudson &O. Box 33877 Charlotte, North Carolina 28288 Felephone (704) 382-4669

October 24, 1990

The Honorable William K. Reilly, Administrator Environmental Protection Agency Washington, DC 20460

RE: Ethyl Corporation Manganese Additive Application

Dear Mr. Reilly:

Please reject the application of Ethyl Corporation to add MMT to gasoline as an octane enhancer. There is clearly too great a risk that the serious health hazards of lead in gasoline will be duplicated with as widespread use of manganese in fuels as contemplated. Because the lead parallel is quite compelling and because we have such extensive experience with lead, please, at a minimum, require large-scale studies of health effects prior to any approval of such additive for widespread use.

Thank you for your attention to my comments.

Chartypen C. Hede

Very truly yours,

Christopher A. Hudson

CAH: bs

TECELVED
7-20
COAR.CONTROL
3 TTO!
7 SECTION 1

October 23,1990

Mr. William K. Reilly, Administrator EPA, Washington, DC 20460

Re: Manganese as an additive to gasoline.

Dear Mr. Reilly:

I believe that the Environmental Defense Fund is right. The use of manganese is a most unwise proposal by the Ethyl Co. I urge you to deny this application for use.

Sincerely yours,

Susan M. Smith

1081/07/800 1081/07/800 1081/07/800

P.26

Administrator William K. Reelly
Environmental Gratection Agency
401 m Street, 5W

Washington, DC 20460

Dear Sie,

My purpose for writing this letter
is to ask you to reject Celyl
Corporation's application to use MMT
as an actane-enhancing gasoline
additive. I am conceined that, by
putting another heavy metal additive
into gasoline (namely, manganese),
our environment may be exposed to a
new health hazard and future unknown
clean-up rasts. This additive should
not be approved for use if we do
not know what the long-term chronic
low-dose effects of human exposure
to manganese use and what a safe
level of manganese exposure is.

Sincerely, Rita Q. Lethert

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Mr Wm. K. Reilly administration of E. P.D. Washington W.C. 20460

Dear Sin;

Jurge you to reject the application of the Ethyl Corporation to use mm T as a gasaline additive This will surely cause horm to the environment, look at the example of leaded gas and this has not been studied enough to warrant its use.

Please please think of the Children Coming along before you jump into a new idea that had not been proven,

Thank you

Mary F. Flonderi

J.O. 134 872

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MECELVED
ACORR. CONTROL
BY 7857
BY 785

IRWIN LEFF 178 - 27th Avenue San Francisco, CA 94121

October 23, 1990

William K. Reilly, Administrator Environmental Protection Agency 401 M Street, S.W. Washington, DC 20460

Re: Ethyl Corporation application for approval of HiTec 3000

Dear Mr. Reilly:

I was shocked to learn that Ethyl Corporation has applied to the EPA for approval of the use of a new gasoline additive called "HiTec 3000." I urge you not to approve the use of this latest attempt to poison the air that we breath -- this time with manganese rather than lead. The Ethyl Corporation has profitted over the years through its sale of the lead additive, and we have all been forced to pay the price in human life and money to rectify their action. They have the burden of showing that their latest effort will not lead to the same result, and this they have not done and cannot do. Too little is known about the long term effect of breathing in manganese, and we should not take the chance that we would be inviting a new environmental disaster.

You owe it to the American people to stop the use of HiTec 3000 until its safety has been clearly and definitively proven.

Very truly yours,

Irwin Leff

\$8.29 8513008

MECHARD Fox CORR.COMTROL

October 22,1990

William K. Reilly, Administrator Environmental Protection Agency 401 M Street SW Washington, D.C. 20460

Dear Mr. Reilly:

This is to urge you strongly to deny the application of the Ethyl Corporation to market the product known as HI-TEC 3000, an additive manufactured from a manganese base. No history exists to assure us that the releasing of manganese into the environment in large quantities would  $\underline{not}$  be poisonous to humans, other animals and plants.

I'm a parent, a grandparent, a family therapist, an author of children's books and an environmentalist. You are the administrator of what is supposed to be the agency that protects our earth, air and water. I realize that, in your position, you may be experiencing a conflict of values: the quality of our life-support system vs. the business of money-making in the corporate sector. Added to your burden, there may also be the factor of political obligation.

price maxner.

Even so, there is only one right thing to do.

Sincerely yours,

JOyce Maxner

269 Greenbriar Court

Newtown Square, Pa. 19073

18 29 9513008

MECELY, ED CORR. CONTROL

October 23, 1990

Mr. William K. Reilly Administrator Environmental Protection Agency

Dear Mr. Lailly:

I am writing to urge you to deny approval of Ethyl Corporation's application to include Hi tec 3000, a manganese-based additive, in gasoline.

At high doors, manganese is a demonstrated human neuroloxin, causing irreversible patthological effects on brain structure. Here is evidence that manganese can brake INA chains, which may indicate cancer-causing potential as well. The cumulative effects of godual manganese contamination of the environment are unknown, but may be assumed to be harmful.

Based on the lessons learned over more. How fifty years of tetraethyl lead exposure and poisoning, there simply is no justification for allowing another toxic heavy metal to be added to gasoline. Please fulfill the mandate of your agency by protecting the environment from the harmful effects of the 3000.

He favor of a reply is requested.

yours truly,

Deborah Lussell

1350 La Playa Santancisco, CA 94122 Richard E. Vincek 59 Tuxedo Avenue Hawthorne, NJ 07506

October 23, 1990

Mr. William K. Reilly, Administrator United States Environmental Defense Agency Washington, DC 20460

Dear Administrator Reilly:

I believe that the Ethyl Corporation's "Hi-Tec 3000" manganese-based gasoline additive will be a major detriment to our environment and urge you to deny their application for its use.

Please help us protect our environment and well being from such obvious abuses.

Sincerely

Richard E. Vincek

REV/bt

13 Dana Lane Colts Neck, N.J. 07722 Oct. 23, 1990

Mr. William K. Reilly, Administrator . Environmental Protection Agency A-100, 401 M Street SW Washington, DC 20460

Dear Mr. Reilly:

I understand that the Ethyl Corporation has applied for approval of a manganese-containing gasoline additive, MMT. In light of our nation's experience with leaded gasoline, I am appalled at the prospect of another toxic substance being used in the same highly dispersed fashion. Given what we now know about cumulative buildup of toxics in air, soil, and dust, It is inconceivable to me that EPA could even consider granting such a request. As a pediatrician and public health physician, I am painfully aware of the seriousness and prevalence of lead poisoning in children. We must not allow this error to be repeated. Please deny Ethyl Corporation's application and prohibit all use of manganese as a gasoline additive. Thank you.

Sincerely yours,

Elizabeth Feuer, M.D.

23 October 1990

Mr. William K. Reilly Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Mr. William K. Reilly:

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000", a toxic manganese-based gasoline additive.

To disregard lessons from a similar experience of 50 years ago by approving the widespread and inevitable dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetion. We are urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

Sincerely,

Mary Lee 1075 Wood Ct.

Hollister, CA 95023

Maryjane Allen 4301 Raleigh Court, #1805 Midland, Texas 79707 (915) 699-4019

October 23, 1990

Administrator William K. Reilly Environmental Protection Agency 401 M Street, SW Washington, D.C. 20460

Dear Administrator Reilly,

Your position as caretaker for the uninformed or unsuspecting public is a responsibility I know you don't take lightly. Pressure to rationalize or minimalize consequences must be tremendous from companies hell-bent on profitmaking schemes. There can be no compromise when blatant disregard for human health and welfare exist solely for a profit motive. I urge you to continue your strong leadership and deny Ethyl Corporation's application for "HiTec 3000", a toxic manganese-based gasoline additive. Our environment and our bodies are so fragile We don't need to reverse or compromise an EPA policy that is our only protection from invisible and random poisoning.

Sincerely,

Maryjane Allen

## ANTHONY BARBARO & ASSOCIATES LTD.

REAL ESTATE FINANCING

10/23/90

William K Reilly 401 M. Street SW. Washington D.C. 20460

Des administration Reilly,

Os a Concerned Citizen and an environmentalest of am asking you to please deny Ethyl Corporation's application for HiTec 3000, a toxic manganese-leased gosoline addition.

Non deteracy it completely

Sincerely Dono Borlesso

315 Inst. Hill Zerington, Va. 2 4450 October 21, 1550

Dear Mr. Rully -

Please tally this letter against allowing
the Ethyse Corporation EPAIs approal of
their new goodine additive Hi Ter 3000.
They should have to supply the test date to
prove that it is not harmful to man and
his environment. and your again should cheek it compily!
Having finish, gotten lead out of goodine,
we do not next to replace it into mangaree!
With all good wishes at that.

Sincerity, James L. Sames, M

Actober 22, 1990

Dear Mr. Reelly,

Flease do not approve the Ethyle Corporation additive, Hi TECBOOD, Containing Manganese. This additive is potentially dangerous and has not been proven safe. For once, let our health needs supercede Ethyl Corporations self-serving profet motive Please deng the HiTEC 3000 application.

Thank you.

Charlet Steffanni 5820 Californin Long Beach CA 90805

### R.M. Sloan

13900 Marquesas Way, Apt. A20 Marina Del Rey, California 90292

ADMINISTRATOR, EPA QJ. 19,1990 WM. K. REILLY SUBJECT: "H; TEC 300: DEAR MIR. REILLY,

PLEARE DO NOT APPROVE

THE HAZARDOUS POTENTIAL

(S SIMPLY TOO BREAT TO PERMIT

THIS PRODUCT TO GO UNI THE

MARKET AT THE PRESENT TIME.

TEARNERTY PRAY THAT YOU

WILL NOT LET THIS HAPPEN.

LORD ILNOWS WEVE GOT

ENOUGH PROBLENIS ALREADY!

SINCFERELY, Rudhun

Eric Trelowicz 2859 E. Emelika Mesa, Oz 85204

Dear William Reilly, adm. EPA I recently read about Ethyl Corps request to use Hitec 3000. I'm sick! First Ethyl corp retarded our childrens minds with lead. Now they want to give us all Parkinson's disease like symptoms with Manganese! Tell then NO - Hell No! We have seen what lead can do; it was supposed to be "Harmless" in small quantities-right? We have no data on Moganese; we had better get it before we decide to put hundreds of tons in our environment - well get our date that way just like PS. Please inform me og of your decisio.

J. Hedrich 409 S. Gladstone Aurora, 1c 60506 October 24, 1990

Dear Mr. Reilly,

I am writing to urge you to deny Ethyl Corporations request to produce and market HiTec 3000. This product will generate large and dangerous amounts of manganese and introduce them into the air. Please, the EPA must be our environmental matchdog and stop companies like Ethyl Corf. from pulling the most over our eyes. Thank you

Sincerely of

## AMY STONE

240 West 15th Street, New York, NY 10011 • 212/255-9206

10/23/90

Dear Administrator Reilly -

d unge ym to deny Etyl Crynatin's Application fri Hi Tec 3000" trice manganese-based Sassline additive.

both the enumers and people.

Sincerely, Jones Stone HEROLD AND HAINES

PROFESSIONAL ASSOCIATION

25 Independence Boulevard

PHONE 908 • 647 • 1022

ATTORNEYS AT LAW

WARREN, NEW JERSEY 07059-6747

Fax 908 • 647 • 7721

October 24, 1990

Mr. William K. Reilly Environmental Protection Agency 401 M Street, S.W. Washington, D.C. 20460

HiTec 3000

### Dear Administrator Reilly:

I am writing to urge you to reject the Ethyl Corporation's proposal to launch a new experiment on the American public with their gasoline additive HiTec 3000. I find it almost inconceivable, given our constantly growing awareness of the need to be gentler with our biosphere and ourselves, and the untold damage suffered and to be suffered from the lead additives of the past 60 years, that a company with Ethyl's record has the chutzpah to suggest that we give another additive a try, without any hard evidence of its long-term safety.

Please keep this country moving in the right direction, both for our own sake and in order to provide the right kind of example for the rest of the world's countries as they wrestle with the balance between near-term economics and long-term stewardship.

And thanks for hanging in there with what must be a pretty thankless job.

Sincerel

William T. Knox IV

2045 15 Cor, S.W. Vero Beach, Il. 32962 October 23, 1990

hany of Stufel

Administrator William K. Keilly Environmental Protection Egenly 401 "m" Street S. W. Washington, D. C. 20460

Dear administrator Reilly:

environmentalist and an active member of secured environmental organizations including Environmental Alegeme Agency, Natural Resources Defence Council, Whe hoture Conservancy, and Duenpeace, of an writing to strongly unge you to deny to the Ethyl Corporation their application for a new product,"

It lee 3000". This manganese based paroline addition is topic and the tox pulmonn status growing addition is toxic and the tox pulmonn status grown and effective energy. I fear the nation would efference another terriber health problem in years to come if not immediately, just at the additions of lead to gosolim beginning in 1925 caused a large amount of lead gosoning throughout the world, and eventually leading to its removal from goodine.

6 Pine Street Scotia, N. Y. 12302-2810 October 24, 1990

William K. Reilly, Administrator Environmental Frotection Agency 401 M Street, SW Washington, D.C. 20460

Dear Mr. Reilly:

The Ethyl Corporation, as you know, is presently asking the EPA to approve a new gasoling additive which it calls "MiTec 3000", and has launched a full blown ad campaign which represents this additive as both safe and - can you believe it - even environmentally beneficial. In reality, "MiTec 3000" contains manganese, a toxic metal known to produce Parkinson's disease at high doses. The technical name for the additive is methycyclopentadienyl manganese tricarbonyl.

This is the same Ethyl Corporation which closed its eyes, and subsequently the world's eyes, to the lead poisoning of 40 workers in its tetraethyl lead laboratories and the deaths of five of them, in 1925. For the sake of company profits Ethyl now wants to open our environment to what would be close to a repeat of the world-wide catastrophe of lead poisoning, not only for presons ingesting the new additive from the air, but also from its dust everywhere that engines using the compound have passed by. Children would thus be particularly at risk. I realize that currently OSHA rates the toxicity of manganese one one-hundredth as high as that of lead, but even if their evaluation is correct, athat is still a substantial and totally unnecessary risk.

Thus it would, a sad and terrible mistake if an agency or our federal government allowed even a diminished repeat of the lead disaster to be foisted on the country and the world.

Please don't give the approval that would let this happen.

Sincerely,

William M. S. Richards

October 23, 1990

Environmental Protection Agency Administrator Reilly 401 M Street SW Washington, D.C. 20460

Dear Mr. Reilly:

The EPA must NOT allow the Ethyl Corporation to use the gasoline additive called "HighTec 3000".

The Ethyl Corporation has misrepresented this new additive as both safe and environmentally beneficial.

Please, DON'T allow manganese to be added to the lead poisoning, disaster, of the world.

Sincerely,

M. & Mrs. E. Shee Lan

Mr. & Mrs. E. Sheehan

12 Beverly Road

Wantagh, New York 11793

FROM: HABIB RATHLE, ND 2350 SONTH AVE B, APT 203 YUMA, AZ 85364

22 oct 90

TO: WILLIAM K. REILLY EPA

RE: "HITEL 3000" GASOLINE ADDITIVE.

Dear Mr Reibly,

I just learned that the Ethyl Corporation, imfamons for its leaded gas is asking for approval by the EPA of a new additive, "HITEC 3000", containing Hangamese.

I hope the EPA will demy approval of yet another chemical, which do years from now, will probably prove to be as dangerous as lead.

I also use you to promote more fuel-efficiency,

Sincerely.

Pediatrician.

67 Sperry Drive Bendetta My 14467 October 20, 1990

Dear Mr. Reilly:

Ethyl Corporation has requested EPA permission to use "Hitec 3000" as a gasoline additive. I understant that there are no validated, impartial, pelr-reviewed, long-term health studies and no similar environment studies to demonstrate the safety of this additive for both people and the environment.

I urge you to reject Ethyl Corporation application to use "Hite 3000 les a gasoline additive.

Sincerely C. Michael Reminger

William K. Reilly
Administrata
Environmental Protection Agency
ful M Street, SW
Washington, DC 20460

October 22, 1990

Dear Mr Reilly

I have recently learned of the Ethyl Corporations neglect to approve a grassion additive called the Toc 3000 to use in the products. I understal this product contains Manganese, a heavy metal which may create serious problem it allowed to be reliable at the environment. I oppose the un of this product a repet that gove as the beautiful products do that approval for its use is fully denied by the EPA. At a time when we are from so many consistential by the Cirisis I think we should stop the high powered offerts of such big money grants as the Ethyl Corporation from pasting three approval of lausely products. That you take assiring the Toc 3000's rejection of for protecting us from patential have.

JAMES A SHROPSHIRE

1144 Grand the ST Paul, MN 5:

# Airline Film & TV Promotions, Inc. - Valley Studio

13246 WEIDNER STREET . PACOIMA, CALIF. 91331 . (818) 899-1151

Oct 22,1990

MESSES S

NAMED OF STREET OF STREET, STR

THE PARTY OF THE P

Administrator William K. Reilly Environmental Protection Agency 401 M Street S.W. Washington, DC 20460

Dear Mr. Reilly,

The wireservices carried an alarming story recently that the Environmental Protection Agency was considering the Ethyl Corporations proposal to introduce HiTec 3000 into our gasoline.

It took this country (USA) sixty years to remove leaded fuel supplied by the Ethyl Corp. from our gasoline after we all learned it was poisoning our population.

It is inhumane to think that the EPA would even consider allowing any company to add toxic heavy metal to gasoline that could further pollute our already foul air. You should know better than I that these additives will do great harm to our already endangered environment.

I can assure you, if the Ethyl Corp. is given the go ahead on this proposal, you will hear the loudest outcry ever from the voters who will certainly let Mr. Bush and the Congress know who is to blame and their future elections will be in very serious trouble.

Fyell Eding Byron W. Schmidt



#### 36th IPA CONGRESS, ROMA 1989

2000 Linwood Avenue, 18P Fort Lee, New Jersey 07024 23 October 1950

Administrator William K. Reilly Environmental Protection Agency 401 M Street SW Washington, D. C. 20460

Dear Mr Reilly !

I am extremely concerned about the Ethyl Corp's wish to use HiTec 3000, containing the toxic heavy metal manganese. We know now the noted damage due to chronic leed poisoning from gas additives.

We have an apportunity to prevent this new scarge from happeney. Let us all prevent our children from inheriting a polluted earth.

Thank you for your time and attention

Best. Werland

MILANO TO THE ASSICURAZIONI

Presentation Graphics Consultant

235 Adams Street Suite 3F Brooklyn Heights, N.Y. 11201 (718) 802-9855

OCTOBER 20, 1990

MR. WILLIAM K. REILLY EPA ADMINISTRATOR WASHINGTON, D.C. 20460

DEAR MR. RETUY,

AS A CONCERNED CITIZEN OF THIS COUNTRY

I FEEL THAT IS IS IMPERATIVE THAT THE E.P.A

DENY ETHYL CORPORATIONS APPLICATION FOR

"HITEC 3000" TO BE USED AS A GASOLINE

ADDITIVE; CONTAINING TOXIC MANSANGSE.

IT IS TIME THAT THE U.S. STOP ALLOWING
CORPORATIONS TO ACT IN UNETHICAL AND IRRESPARSIBLE MANNER TOWARDS OUR ENVIRONMENT
AND CONSEQUENTLY THE PEOPLE OF THE PLANET

THIS IS YOUR OPPORTUNITY TO DIP FUTURE DISASTER IN THE BUD; BEFORE UNTOWN DAMAGE AND COST BEFORE US.

Sincerely, Diame Kadal



Gregory J. Erickson Attorney-at-Law 509½ Second Street Hudson, Wisconsin 54016 (715) 386-9315 (612) 436-8824

October 22, 1990

William K. Reilly Administrator Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Mr. Administrator:

I have learned that an American company, Ethyl Corporation, is applying through your agency for permission to introduce a new gasoline additive known as HiTech 3000. I believe this additive will be harmful to the environment and I urge you to deny permission for its introduction.

The product is unnecessary. The high Manganese content of Hitech 3000 poses a potentially grave environmental threat as well. Finally, Ethyl Corporation has acted irresponsibly in the past. As the principal supplier of lead gasoline additives they have played a significant part in the lead poisoning problems we are facing.

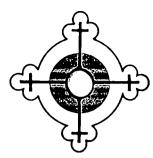
Mr. Administrator, we should not allow another toxic heavy metal to be introduced into our environment. I strongly urge you to deny Ethyl Corporation permission to introduce this product. I would be interested in hearing your views on this matter. Kindly respond to my attention at the letterhead address.

Thank you for your consideration.

Sincerely,

Gregory J. Erickson Attorney at Law

GJE/krs



JOHN F. COGSWELL, Ph.D.
Psychological and Consulting Services

Colministrator William K. Reilly Environmental Protection Squery 401 M Street, Sw Washington, D. C 20460

Dear Mr. Reilly,

For the sake of our environment

and our people, I strongly use you

to deny Ethyl Corporation's application

for "H; Tec 3000", a toxia manganese - bound

gosoline additive.

Sincerely, John F. Logswell 10/19/90

Administrator William K. Reilly Environmental Protection Agency 401 M. Street, 5W Washington DC 20460

Dear Mr. Reilly, Why do I have to ask you to mak a decision that you were direct to mak in the first place?

Please not a decision to PROTECT THE ENVIRONMENT! Please dery the Ethyl Corporations application for "Hi TECH 3000." We do not held any more toxic substances in the environment.

Exciety will feel outwardly betrayed if this application greather.

Granly,

Than Spuldig-Schadlian

p.s. In sch & tired of paying for charitals organizations to nother you nake sure you do the right thing.

Oct. 20, 1990

Dear Administrator Reilly,

We learned recently about Ethyl Corporation's application for "HiTec" 3000, a toxic manganese - based gas additive. We sat in horror thinking that you, the EPA might seriously consider such an

asanine and dangerous move, just so a money hungrey "Big Business" can make a fen extra bucks at our biosphere's expanse

As concerned citizens, we strongly unge you to deny Ethyl Corporation's application.

Sincerety, Kence Olmo

Dana M'Call

Box 112A

Davenport, NY 13750

The EPA:

Dear Mr Reilly,

I am shocked to think that the "thyl Corporation would have the audacity to petition for the approval of the "HiTed 3000" gasoline additive which contains the toxic heavy metal manganese.

How many more decades will it take for us to understand that corporate profit motives parading as consumer benefits are poisoning our environment and destroying our health. If people were informed, if politicians addressed issues of substance, if offices like yours stood up more stringently to corporate strongarming, then I would not be writing to you today.

Do we want a repeat of the lead poisoning epedemic? How many will suffer the effects of toxic manganese exposure if "HiTec 3000" is approved? It is high time to send a message to the corporate sector: "We will not have the lifte of the

environment compromised for a fist full of money."

Trank you Light

William Henry Apartments Ivy 115 Malvern, PA 19355 October 22, 1990

Mr. William K. Reilly, Administrator Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Mr. Reilly,

I am deeply disturbed about the potential use of HiTec 3000 as a gasoline additive. I understand that the additive contains manganese, which at high doses is a human neurotoxin. I also understand that the long-term effects of chronic, low-dose exposure to manganese are largely unknown. Given these facts and Ethyl's actions vis-a-vis leaded gasoline, to approve the use of HiTec 3000 is to sanction environmentally irresponsible behavior. As an environmentalist and a taxpayer, I urge you to live up to the responsibilities of your office by denying Ethyl Corporation's application for HiTec 3000.

Sincerely,

Daryl L. Hall

October 23, 1990

2 Waterview Road, D-10 West Chester, PA 19380

William K. Reilly Administrator Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Mr. Reilly,

I strongly urge you to deny Ethyl Corporation's application for HiTec 3000. The gasoline additive contains manganese, a toxic heavy metal that in high doses is a demonstrated human neurotoxin. There's no reason to open our environment to a new health hazard, and we can't tolerate future unknown clean-up costs when this problem is totally preventable today. As an environmentalist and a taxpayer, I urge you to rise to the responsibilities of your position and prohibit the introduction of HiTec 3000.

Sincerely,

Anne B. Swigart

2310 Hay. 1063 Independence, La. 70443 10/20/90

Dear Mr. Reilly,
We need cleaner facels and safe energy alternatives,
not toxic zoroline additives. I strongly urge you to
reject Ethyl Corporation's application to manufacture and
market "Hi Tec 3000."

Sircerely, Taanh J. Chalma J. CURTIS PHILBROOK
43 LAFAYETTE SE
GRAND RAPICS MI 49503

09 55,40

Greetings Mr. Reilly.

This latter regards the issue of "HiTex 3000 addithing to gazdino ling proposed by the Ethyl Corporation. Since there are serious questions about the use of management additures, I unge you to take the time to fully study the issue.

Being aware of your background and concern for our planet, I know you want to do what's right. Since I'm also aware of the politics of corporate incluence, I recogning that you need the support of a concerned population to affect the changes you know one needs and in protecting type on Courts.

to your the organing ations which I perceive now benefit our world. Please use your influence to help these organizations of workered induiduals to preserve and whence to the organizations of whence to the organizations of whence to the ordands to preserve and whomee Earth's life and resources.

Please do not approve HiTec 3000"

while all consequences can be anestyped.

Thinks you agree we need to put human one invitable health above the great for profits (shoot-term profits and long-term ignorance = future problems.)

Since ely Cintus of Phillewoods

1001 N. PROVIDENCE RD MEDIA, PA. 19063 OCTOBUR 20, 1990

ENVIRONMENTAL PROTECTION AGENCY 401 M STREET SN WASHINGTON, DC 20460

DEAR SIR:

AS AN ENVIRONMENTALIST AND WORLD CITIZEN CONCERNED ABOUT THE QUALITY OF THE AIR SE ALL BREATHE, I STRONGLY DRGE YOU TO DENY ETHYL CORPORATION'S APPLICATION FOR HITEC 3000, A TOXIC MANGANESE-BASED SAFOLINE ADDITIVE.

IF WE PREVENT THIS STUDTION NOW, WE NON'T THIS SPEND THE MONEY TO CURE NON'T THIS SPEND THE MONEY TO CURE IT LATTER AS WE DID WITH THE VERY SAME COMPANY'S TETRA ETHYL LEAD ADDITION

YDORS TRUM,

Carol J. Conlow

Dear Mr. Reilly.

I am writing to you today in hopes of preventing another Ethyl Corporation disaster. The unknown hazardous potential of "HiTec 3000" is reason enough NOT TO APPROVE it as the gasoline additive of the '90's.

Our environment and public health cannot be exposed to further, probable irreversible, damage. Both are struggling for survival as it is!

Now is the time to take advantage of a rare opportunity indeed. This is one environmental disaster that can be prevented; one chronic exposure experiment that the U.S. population need not be subjected to.

I strongly urge you, as Administrator of the EPA, to seriously consider Ethyl Corporation's past history of "safe and environmentally beneficial" gasoline additives, as well as the possible future consequences to the environment and human health; then convince yourself and your colleagues to BAN "HiTec 3000" ... BEFORE IT'S TOO LATE!

Sincerely,

Cd. Morac Jewski

C.L. Moraczewski

36 Porter Street Somerville, MA 02143 26 Oct 90

William K. Reilly EPA Administrator 401 M Street, SW Weshington, DC 20460

Dear Mr. Reilly:

Please deny the application of the Ethyl Corporation to add MMT to gasoline. We do not manganese spread throughout our country as leaff is. Emissions are better reduced by aiding Public Transportation and getting auto manufacturers to better engineer their cars. Not by releasing a dangerous toxic chemical everywhere we live, work, and play.

Has anyone studied the effects of MMT and manganese on catalytic converters? Will they foul the converters and ruin them?

I also ask that you do everything possible to prevent the Ethyl Corporation from exporting this dangerous technology.

Thank you.

Sincerely,

Leonard Tower

28 October 1990

Mr. William K. Reilly E.P.A. Administrator Washington, D.C. 20460

Dear Mr. Reilly:

It is my understanding that the Ethyl Corporation has introduced a new gasoline additive, methycyclopentadienyl manganese tricarbonyl (M M T) and has asked EPA to approve it as an octane-enhancing gasoline additive.

Let us not repeat the mistake which was made in 1925 when the Ethyl Corporation introduced the additive tetraethyl lead to the gasoline used in our cars. We learned too late of the deadly effect this additive has had on the lives and health of our citizens. We cannot afford another such mistake.

I wish to register my opposition to any approval of (M.M.T) by EPA for use as an additive to the gasoline used in our motor vehicles.

Please give this matter the attention which it deserves and let me know where you stand on the question.

Respectfully,

Lawrence C. Lemmon 2524-A S. Arlington Mill Drive Arlington, Virginia 22206 Dear William K. Rilley
Environmental Protection Agency
401 M. St. SW
Wash D.C. 20460

Please do not allow Ethel Corp to sell a new gas called Hi Tec 3000. This contains manganese a toxic heavy metal known to produce symptoms of Parkinson's disease. The long term effects are unknown and could be dangerous. This same company has championed the use of leaded gas since 1925 which we now know to be quite a health hazard.

ARTHUR FREYER
2409 Mc Kinley
Berkeley CA 94703

Trene Dobry Glass 7957 Ashford Boulevard Laurel, MD 20707

October 29, 1990

Mr. William K. Reilly Administrator EPA Washington, DC 20460

Dear Mr. Reilly:

Please reject Ethyl's application to use MMT as a gasoline additive. As you know, MMT is a manganesed-based compound, and manganese is known to be a human neurotoxin. We have already done enough damage with lead—let's not risk doing the same with manganese! Furthermore, Americans have been doing just fine with the gasoline that is available for sale now—without MMT! Please heed the request of the American people you watch over, and keep our environment as safe as possible in this highly toxic age! We're counting on you!

Thank you.

Sincerely,

Irene Glass

Irene Class

George Shen 49 Robinson Parhwar Burleyton, V+ 0540/ 10/27/90 William K. Reilly, Head Exerirmmental Protection Agency Washington, DC 20460 Dear Mr. Reilly:
This note is to unce you to reject the pending proposal to allow manganese as a gusoline additive in the U.S. I'm not a scientist, but I've read the report on the proposal in the Environmental Defense Fund Newsleder, I and I'm convinced by what is see there. Best to en on he side of courtin - we don't meed a repetition of the lead disaster. Sincerely, George Fle

Karen L. Aldridge 6505 Paula Court North Richland Hills, Tx 76180

William K. Reilly Environmental Protection Agency Washington, D.C. 20460

October 24, 1990

Dear Mr. Reilly,

I am concerned about the application of The Ethyl Corporation of America to the Environmental Protection Agency for approval of a manganese-based gasoline additive called HiTec 3000.

Manganese is a toxic heavy metal. Long-term effects on humans breathing this metal are unknown. I personally don't want to be the human test subject for breathing this toxic metal.

Please read about manganese. Have research done. Learn what scientists do know about the effects of this on living beings.

And when you're done, DENY Ethyl Corporation's application, for us, for the children, for the good of all air breathing creatures.

Thank you for your help.

Karen aldudge

Sincerely,

Karen Aldridge

CC

## BALIS & STONE

( EDICH)

General Agency Berkshire Life Insurance Company 151 Merrimac Street, Suite 300 Boston, Massachusetts 02114 (617) 722-0300 (617) 722-0301—FAX

John Balis, CLU, ChFC Richard P. Burton, CLU, ChFC Barry F. Cohen Sherman Cohen Kenneth P. Kates, CLU, ChFC Mitchell Marcus, CLU Joseph Stone, CLU, ChFC

October 25, 1990

William K. Reilly, Administrator Environment Protection Agency 401 M.ST. SW Washington, DC 20460

Dear Administrator Reilly:

Please deny Ethyl Corporation's application for Hi Tec 3000 which is a toxic manganese - based gasoline additive.

The EPA should be doing everything possible to clean up the air pollution in this country. By denying Ethyl Corporation's application for Hi Tec 3000, you would be doing something positive toward lowering air pollution.

Sincerely yours,

Kenneth P. Kates, CLU,

KPK: kad

37 Hill Street Williams Bay, WI 53191 October 26, 1990

Administrator William K. Reilly Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Sir,

I am writing to ask you to deny Ethyl Corporation approval to use "HI Tec 3000" as a gasoline additive.

"Hi Tec 3000" contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. No one knows what health problems will be created from chronic exposure to manganese or how much money will be required to clean up manganese contamination.

Ethyl Corporation is the company that championed the use of leaded gasoline, which has contributed to lead poisoning for millions of children around the world. Children ingest the lead from yards and playgrounds contaminated by lead from automobile exhaust. New research indicates that lead poisoning is a virtual epidemic among our nation's children, both rich and poor as well as urban and rural children. Cleanup of contaminated soil will be both slow and extremely expensive.

The EPA has the power to prevent another environmental and public health disaster by denying Ethyl Corporation to market "Hi Tec 3000". Please prevent Ethyl Corporation from exposing the public to yet another toxic heavy metal with unknown health effects and cleanup costs.

Sincerely.

Theresa Foley

#### **HEALTH DYNAMICS CHIROPRACTIC**

Dr. Robert K. Zigler Dr. Katherine N. Zigler

1819 W. State Street Boise, Idaho 83702 (208) 345-0969

10-25-90

William K. Reilly Administrator Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Mr. Reilly,

As a physician, environmentalist, and concerned citizen, I must strongly urge you to deny the request by the Ethyl Corporation for permission to add "HiTec 3000" to gasoline. "HiTec 3000" is based on manganese, which is a proven nuerotoxin in high levels. What is unproven though, is what the long term effects of manganese would be if accumulated in the tissues over a period of time. This is reminiscent of the health disaster that has resulted from the use of lead in gasoline (another "gift" from the Ethyl Corporation) over a period of several years. Please help us to protect our children:

Sincerely,

Roberta Bigle DC

Robert K. Zigler, D.C.

To EDF Member: Mr. Steve Nash

206 Stasia Ct

NOVATO CA 94947-1918

Membership No:

04690681

ABCW6B.

Dear Mr. Nash:

I am inviting you -- as one of a select group of EDF's most active members -- to sign our "Open Letter to the EPA" . . . urging that EPA deny the Ethyl Corporation's application for "HiTec 3000," a toxic manganese-based gasoline additive.

I need to receive your answer by October 29 to meet the advertising deadline. Please respond immediately.

Fred Bygo

YES, Fred, I accept your invitation to sign on to EDF's Open Letter advertisement protesting Ethyl Corporation's "HiTec 3000" proposal, which would release large quantities of manganese into the environment.

I am enclosing the following tax-deductible gift to support the cost of the ad as well as EDF's scientific work on this critical manganese campaign and other efforts to protect the environment:

□ \$100

□ S50

\*□ \$35

□ S20

\*A gift at this level or higher will move your name to a more prominent position in the ad under the banner "Member Leadership Committee on Manganese."

Your name will appear as follows: (make any corrections needed)

Mr. Steve Nash

The ad will include the Open Letter (below), the names of all participating members, and added technical information on the issue -- see the other side of this page for an advance EDF LETTER column on Ethyl Corporation's proposal.

> (This advertisement paid for by the undersigned members of the Environmental Defense Fund)

OPEN LETTER TO WILLIAM K. REILLY ADMINISTRATOR, UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a toxic manganese-based gasoline additive.

Sincerely,

The Undersigned Members of the Environmental Defense Fund

I would prefer not to sign on to this advertisement but I would like to make the
folowing tax-deductible gift in support of EDF's efforts:

A copy of the last financial report filed with the Department of State may be obtained by writing to: New York State Department of Charities Registration, Albany, NY 12231, or to EDF, 257 Park Avenue South, New York, NY 10010.

#### Stea

## A New Idea from the Folks Who Gave Us Leaded Gas

By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.

n 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won



removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.

Now, in 1990, Ethyl comes bearing

yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

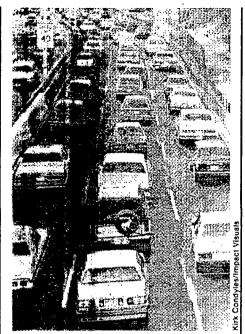
Lead poisoning is an epidemic in the U.S. Even after considerable reductions

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.

have been imposed on the use of lead in gasoline—only after prolonged debate and litigation, it should be noted—we are just now confronting the extraordinarily difficult challenge of cleaning up the esidues of lead fallout from playgrounds, adsides, and backyards in America.

The parallels between Ethyl's 1990 posal to use manganese and its 1925 I proposal are chilling. The exclusive ification for each additive is its worted effect on emissions of hydroms and nitrous oxides from cars. No were or are given on the potential lative health effects of massive of a toxic metal into the environts deposition on surface dusts and its long-term fate and pathways were to humans.

15, Ethyl argued that the amounts be added to gasoline were neglithat lead was only toxic at the es encountered in certain insettings. In 1990, it argues that



With ever-increasing numbers of cars on the road, manganese added to gasoline would—like lead—accumulate in the environment with potentially tragic results, particularly in urban areas.

the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor-more important-any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead—we have not yet conducted a massive human experi-

ment with manganese. But both what we know and what we do not know about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do not know what the long-term chronic, low-dose effects of human exposure to manganese are. We do not know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do not know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancercausing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will

Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.

accumulate in many places—particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

EDF MEMBER ACTION ALERT Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT. 4860 Clayton Road, Apt. 38 Concord, CA 94521 October 24, 1990

William K. Reilly Administrator, Environmental Protection Agency 401 M Street, SW Washington DC 20460

Dear Mr. Reilly,

I recently received a letter from Fred Krupp of the Environmental Defense Fund, outlining a proposal by the Ethyl Corporation to win EPA approval of their "HiTec 3000" gasoline additive. "HiTec 3000" contains manganese, a toxic metal. As I understand the issue, about as much is known about long-term chronic manganese exposure today as was known about long-term chronic lead exposure in 1925, when leaded gasoline was introduced. Chronic long-term lead exposure turns out to have created, because of children's high sensitivity to lead, a nationwide epidemic of learning impairment. Let's not create another toxic sequel to leaded gasoline.

You and your agency have before you a rare, well-publicized, opportunity to be proactive, to BE your name. Please help protect the environment. Reject the Ethyl Corporation application for "HiTec 3000."

Sincerely,

Randall M. Clague

October 16, 1990

Dear Friend:

I've had just about enough of the Ethyl Corporation. And once I tell you about the scheme that they're trying to put over on the U.S. population, I think you'll agree.

- The Ethyl Corporation of America is asking the EPA to approve a gasoline additive it calls "HiTec 3000."
- Ethyl Corp. has launched a full-blown ad campaign that misrepresents this new additive as both safe and environmentally beneficial.
- In reality, "HiTec 3000" contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses.
- Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

In other words, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal.

And it won't be the first time!

Since 1925, Ethyl Corporation has championed the use of leaded gas, and has been the chief supplier of lead gasoline additives now known to have been a <u>major</u> contributing cause of chronic lead poisoning affecting millions of children around the world.

New research reveals a virtual lead poisoning epidemic among our nation's children, both urban and rural, rich and poor. Much of that lead -- ingested from dust and dirt in yards and playgrounds -- came out of the tailpipes of cars that burned leaded gas over the past 65 years. Cleaning up this contamination will be both slow and expensive.

Now, for the sake of its own profit, Ethyl Corporation is again ready to put our environment and public health at serious risk.

Luckily, you and I have until November 6th to stop them.

(over, please)

Ethyl has until November 6th to convince EPA to approve HiTec 3000. And it has been running full page ads in major newspapers in a shameless effort to lure the public and the Administration into believing that its new additive is safe.

This is one of those rare chances we have to nip an environmental disaster in the bud. Here are the 3 steps I ask you to take immediately:

- 1. Add your name to our "Open Letter to the EPA" to appear in a major newspaper advert enclosed draft) to help us Corporation to newspaper reaccis.
- 2. <u>Double</u> the power of your protest by writing a short personal note to Administrator William K. Reilly, Environmental Protection Agency (401 M Street, SW, Washington, DC 20460).
- 3. Send your generous gift to support the newspaper ad and to help EDF continue this critical campaign.

You know that EDF can get results. Our persistent campaign against leaded gasoline helped win its large scale phasedown during the 1970's. But this was a battle we might never have had to fight, had Ethyl Corporation acted responsibly from the start.

You see, the hazardous potential of the original lead gasoline additive was never a secret to Ethyl. Back in 1925, 40 workers at Ethyl's first plant were stricken with lead poisoning and five of them died from it. But Ethyl Corp. ignored the obvious warning sign -- that these cases of acute poisoning foreshadowed a possibly tremendous chronic problem . . . once millions of tons of lead-laden car exhaust were pumped ino the environment.

We simply can't let Ethyl Corp. put another toxic heavy metal additive in gasoline! There's no reason to open our environment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether preventable today. And with your help, and the 3-step plan I've sketched above, we won't have to!

Ethyl Corporation managed to fool the public once . . . and the resulting damage to the environment and public health, much of it irreparable, is done. All we can say now is "Shame on them."

But if we let them do it again, shame on us!

Yours truly,

Fred Krupp

Executive Director

P.S. Please sign and return <u>immediately</u> the Authorization to add your name to our Open Letter. I must receive it no later than October 29th to meet our newspaper deadline. And thanks in advance for your help!

Keilly - Wleave your

Judith Niemeyer 12712 Ojai Rd. Santa Paula, CA 93060

William Reilly, Administrator Environmental Protection Agency 401 M Street SW Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

Judith Niemeyer

Judith Niemeyer

1/29/90

Violet Oaklander 2929 Glen Albyn Dr. Santa Barbara, CA 93105

William Reilly, Administrator Environmental Protection Agency 401 M Street SW Washington, D.C. 20460

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Most sincerely,

Violet Oaklander

Quele allando

Administrator William K. Reilly Environmental Protection Agency 401 M Street JW Washington, D.C. 20460

Dear Mr. Reilly:

I am opposed to EPA's approval of the Ethyl Corporation's HiTec 3000 additive. It will be a serious mistake to allow another heavy metal to pollute our atmosphere through automobile advanst.

Sincerely,

Janie J. Frank

843 Dorsey Drive Hudson, WI 54016 October 19, 1990

Administrator William K. Reilly EPA Washington DC 20460

Dear Administrator Reilly:

As a concerned member of this nation, I ask of you to reject Ethyl Corporation's application for "Hi Tec 3000." It has in it a toxic manganesse-based gasoline additive whose long term effects on human health are unknown.

Sincerely,

Moun R. Zenz Mark R. Zenz Mrs. Ronald Lewis Refsland Dwo Highland Circle Lewisburg, West Virginia 24901

Administrator William K. Reilly Environmental Protection Agency 401 m street, SW Washington, DC. 20460

Dear Mr Reilly,

I urge you to turn down Ethyl Corporations

request for a gasoline additive called

'Hi Tec 3000." A clean environment

is important for everyone's good health.

Say no to Ethyl Corporation.

Sincerely, Lucie Repsland. William K. Reilly Administrator Environmental Protection Agency

22 October 1990

Dear Administrator Reilly

We strongly urge you to deny -- without hesitation -- the application by Ethyl Corporation for the use of "HiTec 3000," a toxic, manganese-based gasoline additive.

This compound represents nothing more than a giant step backward — to days of leaded gasoline and the awful, lingering health problems it created. We know much about the effects of leaded gasoline on our environment. We know as well that manganese may selectively affect the fetus, the young and the aged. We also know that manganese will accumulate in many places — particularly in urban dusts and soils which are subject to intensive human interaction.

The message is clear. We cannot afford to repeat the tragic mistakes caused by leaded gasoline.

We urge you again to deny -- quickly -- the application of Ethyl Corporation to use HiTec 3000.

Sincerely

Alan and Monica/Gregory

P0 Box 571

Conyngham PA 18219

October 21, 1990

Mr. William Reilly, EPA Administrator Environmental Protection Agency 401 M Street, SW Washington DC 20460

Dear Mr. Reilly:

I have recently learned of the Ethyl Corporation's plans to market methycyclopentadienyl manganese tricarbonyl (MMT) as an octane-enhancing gasoline additive. Contrary to their promotional campaign ads and announcements, I fear that such a product carries a significant risk to the environment and the health of the American public. There is as little known today about the long term effects of exposure to manganese as there was in 1925, when the Ethyl Corporation promoted lead additives which we now know as one of the most serious environmental pollutants.

I am tired of living in a country which only reacts to environmental and human threats after we are past the point of no return. There is now clear evidence which shows that manganese acts as a human neurotoxin in high doses. What we do not know is what horrendous effect it may have on the environment and human health fifty years from now. Personally, I have no interest in becoming one of Ethyl's fifty million American test subjects.

Please, help America learn from the mistakes of the past. Do not let Ethyl Corporation pull the wool over the public's eyes as it did in 1925. Ethyl Corporation's sole concern is the increase of profits. My concern is for the safety and well-being of my children, community, and planet. As Administrator of EPA, I hope you will strengthen the resolve of your organization and stand up to Ethyl Corporation. I ask you to reject Ethyl Corporation's application for the manufacture and marketing of MMT and suspend all current uses of manganese as a gasoline additive.

If Ethyl Corporation has no ethics, or concern for the lives of the public, you can impose a conscience upon them--one which is backed by the full strength of the law. Thank you for your attention and courage in this matter.

Sincerely.

Dean M. Duncen MS.

Dean M. Duncan M.S. 305 S. Dixon Carbondale, IL 62901 (618) 549-4637

### greg treleaven

136 north street ● weymouth, ma. 02191 ● (617) 337-4022

10/18, 1990

Mr. William K. Reilly Administrator United States Environmental Protection Agency Washington, DC 20460

Dear Mr. Reilly,

I strongly urge you to deny the Ethyl Corporation's application to use any manganese based gasoline additives in their gasolines. They have already done enough damage to our health and our childrens' health.

Why doesn't anyone seem to have any common sense any longer?

Sincerely

Treleaven

### FRESH DIGGIN'S



Rt. 4, Box 93 Ellsworth, WI 54011 (715) 792-2342

10-20-90

An Organic Farm Specializing in Vegetables, Herbs and Dried Flowers

Dear William K. Reilly,

I am deeply concerned about a new gasoline additive called "Hitec 3000" (by the Ethyl Corporation of America.)

Please don't allow this "HiTec 3000"

That contains manageness to infiltrate

or air and increase our health problems.

MMT can betoxic, once again please

do not allow the Ethyl Corporation

to use this dangerous additive.

Snoevely, Espec

4 Paright Circle Amharst, MA 01002 Oct. 21, 1990

William K. Reilley ElA Administrator Washington, OC 20460

Dear Mr. Reilly,

I am concerned about Ethyl Corporations application to use MMT (methylogolopentalicnyl manganese tricarbonyl) as an octane-enhancing gaseline additive.

Given that extremely to xic side effects of manganine in high dones are known, and that its effects at low dones over long periods of time connect be known yet; given about the trauma we have been going through over lead all these years, can be we risk putting our selves, our soils, our air at such a costly rish once more?

I feel strongly that Ethyl's application be rejected, until such two as they can prove this additive will ready have no adverse effects — an who in their right minds seriously believes that?

I urge you to use the power in your hounds to have this application rejected, and would be grateful to hear how you think in this regard,

Sincerely yours,

PETER D. Luborsky Peter D. Luborsky

P.91

P.O. Baf 636 Stockwedge, Mo.01262 Oct. 22 rd, 1990

Hellom K. Reilly O. P. a. administrator Thas Lengton, D. C. 20460

Near Mr. Reilly.

I was very distribuled to learn that

The C'Yhyl Carparation ever planning to add

manganise to Their gasaline. with the

strong passibility that this waseld have

very himful effects upon our our and

heaven knows what else. 
at a time when we are dispurately trying to clean dur air, locater, sail from all sarts of pallutants which evere lightrantly and callewaly added in the odding a new centested, and passinly very dangerous seeds lance to deer environment.

(mr) Harrine Modane Robert M. Lane



1233 Surry Place Cleburne, TX 76031 (817) 641-6896

Administrator William K. Reilly Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Sir:

Please protect the environment by rejecting Ethyl Corporation's request to use HiTec 3000 gasoline additive. We do not need to improve octane at the expense of public habitat. We are already paying for the effects of Ethyl's original lead additive. Approval of methylcyclopentadienyl manganese tricarbonyl (MMT) simply substitutes one toxic heavy metal for another. Ethyl argues that manganese is only toxic at high doses in industrial settings. What it seems to fail to recognize is that congested freeways *are* industrial settings. Even if using MMT reduces emissions in volume, the effect of manganese emissions is much more heinous than existing emissions. It is, in effect, the greater of two evils. Unfortunately, Ethyl will probably be able to sell HiTec 3000 in Mexico where the continued use of leaded gas is directly responsible for low-level brain damage in children.

Sincerely,

B. WARE

Bill Ware

Mrs. Mancy Bell, M.T. (ASCP)
7030 Longview Dr.
Solon, OH 44139

Doar administrator Reilly,

City (Corporation's application for "HiTec" 3000, a toxic manganese—
Ethy (Corporation's application for "HiTec" 3000, a toxic manganese—
based gasoline additive. I am employed as a clinical toxicologist for based gasoline additive. I am employed as a clinical toxicologist for nine years and feel that the dangers of manganese are real and at nine years and feel that the dangers of manganese are real and at least need to be investigated further before permission for such a product least need to be investigated further before permission for such a product least need. What happened to the scientific method?

Please deny Ethyl Corporation's application for Hi Tec 3000"...
Our children's future can be greatly controlled by your decisions...
please make the right choice for them and our only planet.

Incerely, Nancy Bell

Dr. David Deutsch 23 Oxford Rd. Newton Center, Ma. 02159

October 19, 1990

William K. Reilly Environmental Protection Agency 401 M Street, S.W. Washington, D.C. 20460

Dear Mr. Reilly,

I am writing to urge you to reject the request by Ethyl Corporation to introduce a product called "HiTec 3000", a toxic manganese-based gasoline additive. I am a member of EDF and am very concerned about the future of our environment. We are still recovering from the damage caused by lead additives to gasoline. Why do we want to allow another toxic additive into our country's gasoline supply? Please reject the request for Ethyl Corporation to add toxic manganese to our gasoline supply.

Thank-you for your time. I appreciate all of the efforts you have made to protect our environment.

Sincerely yours,

Dr. David Deutsch

Estell-Hetzler ct.3, Box 217 Bloomfield, Johna, 52537

Dear Mr. Keilly. I am writing to urge you to right Ethyl Corporation's application to use MMT, a gasoline additive product known as "H' Tec 3000." This product is known to contain large amounts of manganese, a topic heavy metal. approval of the product would subject all of us to another toxin in our air and would certainly be a major step backwards in all efforts for Clean au.

> Sincouly EstellaHetyler

William K. Reilly
Administrator
Evironmental Protection Agency
401 M St. SW
Washington DC 20460

# Mr Reilly,

I'm writing to urge you to reject Ethyl Corporation's Hi Tech 3000 fuel additive. The additive methycyclopenta dienyl manganese tricarbonyl MMT, contains manganese which is proven to be a human neurotoxin with irrevesible effects on the brain. It also can break DNA similar to cancer causing agents.

Please put the onus on Ethyl Corporation to prove the safety of maganese pollution.

Do not allow the public to be a mass experiment in low level texic pollution such as with read additives to gasoline.

There can be NO safe limit to any human neurotoxin. The clean up of passed mistakes cost the texpayers, not the benifing corporations.

Thanks for your time, James Mossel Itall Timbers Rd, Tall Timbers MD 20690 October 23, 1990

William K. Reilly-Administrator Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Mr. Reilly:

As a concerned citizen for the saftey of our environment, I strongly urge you to deny the Ethyl Corporation's application for "HiTech 3000," a toxic manganese-based gasoline additive I believe needs further testing before it is released into the enviroment .

Sincerely,

alise E. Pettmen

2308 Catameran Ct. VA Beach, VA 23451



991 Sagamore Way Sacramento, Ca 95822

artist

(916) 441-6205

10/23/90 Wm Kelly, as an artist I am well aware of the topicity of manganese. I am urging you to deny Ethyl Corporations application to use "HiTec 3000" as a gasslene addetive. It is bad enough that leaded gardines are still at the pumps. Junia m Fronce Showers F. Hall

Dear Mr. Reilly,

It has recently been brought to my attention that your agency will be making an important decision soon on the issue of manganese in gasoline. I sincerely hope that you will consider the possible health effects that this could have on the people of this country. We have recently been phasing out the use of lead in fuels and I view this as an important step in protecting and cleaning our environment. It would be tragic to introduce new substances into fuels that could cause greater harm in the future.

I know how difficult it is to change lifestyles in order to make the world a cleaner and safer place. But I think that most Americans would choose not to introduce new substances to fuels if they were aware of the possible effects. Ethyl Corp. knows this and through advertising is attempting to cloud the issue and cover up the problems that could come along with the use of their new product, "Hitec 3000". The average concerned citizen has no easy way to have his or her voice heard on this issue, or to get a clear view of the realities in this situation. So please, watch the support that the EDF is able to generate on this issue and remember that they are not financed by large companies. Their support comes from regular people like me. Please don't allow the Ethyl Corporation to market "HiTec 3000".

Sincerely,

Daniel Choi

44 TRAMP DR.

SAN RATALLEA 94901

Some address

Mid. 85:5: